

CGG 17-019296
Shapiro & DeNardo, LLC
14000 Commerce Parkway, Suite B
Mount Laurel, NJ 08054
(856)793-3080
Chandra M. Arkema - 029552006
Krystin M. Kane - 171402015
Katherine Knowlton Lopez - 013502011
Kathleen M. Magooon - 040682010
Donna L. Skilton - 013072007
Charles G. Wohlrab - 016592012
Courtney A. Martin - 098782016
Jeffrey Rappaport - 003431991

ATTORNEYS FOR CARRINGTON MORTGAGE SERVICES, LLC

IN RE: UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
CARMEN L PALMER, DEBTOR CASE NO.: 18-18338-ABA
CHAPTER 13

HEARING DATE: JULY 11, 2018

NOTICE OF OBJECTION TO CONFIRMATION

The undersigned, Shapiro & DeNardo, LLC, attorneys for the Secured Creditor,
CARRINGTON MORTGAGE SERVICES, LLC, the holder of a Mortgage on Debtor's property
located at Lot 234 C0234 Block 1070 Commonly known as 1534 Hamilton Court, Mays Landing
(Hamilton Township), New Jersey 08330, hereby objects to the Confirmation of the Debtor's
proposed Chapter 13 Plan on the following grounds:

- 1) Debtor's proposed Chapter 13 Plan does not provide for the curing of the full amount of the mortgage arrears accrued at the time of the Bankruptcy filing to Secured Creditor. Debtor's Plan proposes to pay Secured Creditor \$0.00. Secured Creditor is owed pre-petition arrears in the amount of \$25,877.26.
- 2) Debtor's Chapter 13 Plan does not provide for the Secured Creditor to receive distributions with a value equal to the allowed amount of its claims required by 11 U.S.C.1325(a)(5)(B)(ii).

3) Debtor's Plan provides for a potential loan modification offer to cure pre-petition arrearages, but does not provide direction in the event this loan modification is not offered.

WHEREFORE, CARRINGTON MORTGAGE SERVICES, LLC respectfully requests that the Confirmation of Debtor's Chapter 13 plan be denied and that the Debtor be required to file an Amended Chapter 13 Plan providing for full payment of arrears due to the Secured Creditor.

SHAPIRO & DENARDO, LLC

By: /s/ Charles G. Wohlrab
Charles G. Wohlrab, Esquire

Dated: 5/21/18

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IN RE: **UNITED STATES BANKRUPTCY COURT**
FOR THE DISTRICT OF NEW JERSEY

CARMEN L PALMER, DEBTOR

CASE NO.: **18-18338-ABA**
CHAPTER 13

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CERTIFICATION OF SERVICE

I, Emily White

1. represent the _____ in the above-captioned matter.

am the secretary/paralegal for Charles G. Wohlrab, Esquire, who represents the Secured Creditor in the above-captioned matter.

am the _____ in the above case and am representing myself.

2. On 05/21/2018, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:

Notice of Objection to Confirmation of Plan,

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Signature



Emily White

Dated: May 21, 2018

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Carmen L Palmer Pro Se 1534 Hamilton Court Hamilton Township, NJ 08330		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Carmen L Palmer 1534 Hamilton Court Hamilton Township, NJ 08330		<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)

SHAPIRO & DeNARDO, LLC

ATTORNEYS AT LAW

A PENNSYLVANIA LIMITED LIABILITY COMPANY

**14000 Commerce Parkway, Suite B
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Tel: (856) 793-3080 Fax: (847) 627-8809

**GERALD M. SHAPIRO +++
DAVID S. KREISMAN **
CHRISTOPHER A. DeNARDO +**

+ Licensed in New Jersey and Pennsylvania
++ Licensed in New Jersey and New York
+++ Licensed in Illinois and Florida
++++ Licensed in New Jersey and Florida
+++++ Licensed in Rhode Island and New Jersey
*+ Licensed in New Jersey, Pennsylvania, Florida
* Licensed in New Jersey Only
** Licensed in Illinois Only
*** Licensed in Pennsylvania Only

NJ Attorneys

**CHANDRA M. ARKEMA +
Managing Partner – NJ
KATHLEEN M. MAGOON *
Supervising Foreclosure Attorney
KRYSTIN M. KANE++++
KATHERINE KNOWLTON LOPEZ +
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DONNA L. SKILTON +
CHARLES G. WOHLRAB +
JEFFREY RAPPAPORT*
GARY M. KANELLIS ++
Of Counsel**

May 21, 2018

United States Bankruptcy Court
Mitchell H. Cohen U.S. Courthouse
400 Cooper Street
Camden, NJ 08101

In Re: Carmen L Palmer, Debtor
Case No: 18-18338-ABA
Chapter: 13
Secured Creditor: CARRINGTON MORTGAGE SERVICES, LLC
Our file number: 17-019296

Dear Court Clerk:

Enclosed please find Notice of Objection to Confirmation, said Confirmation Hearing presently scheduled before the Court on July 11, 2018 at 9:00AM.

Thank you for your attention.

Very truly yours,
Shapiro & DeNardo, LLC

By: /s/ Charles G. Wohlrab
Charles G. Wohlrab, Esquire

Enclosures

cc: Carmen L Palmer Pro Se Debtor
Isabel C. Balboa, Chapter 13 Standing Trustee, Trustee
1534 Hamilton Court
Hamilton Township, NJ 08330